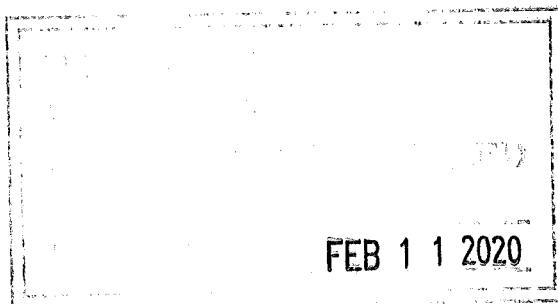




February 9, 2020

Judge Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
Courtroom 906
New York, New York 10007



VIA ECF

Re: USA vs. Motty Drizin
20 CR 36 (AJR)

Dear Judge Nathan:

This letter submission is to request that the above named defendant be permitted to travel overseas for the Passover holiday. I certainly realize that this type of request is unusual but I would hope that Your Honor will closely consider the circumstances under which it is being made.

Each year Motty Drizin's family gathers together for the Passover holiday in Italy. It is an opportunity for Motty's parents to have all of their children, grandchildren and great children together for the entire holiday. This year the holiday of Passover is from April 8 – 16 2020. In order not to travel on the holiday he requests that he be allowed to travel from April 6, 2020 and return April 19, 2020 to Milan Italy. He would be staying the entire time at Regina Palace Hotel, Corso Umberto I, 29 28838 Stresa VB, Italy. Attached to this request is the list of family members and their dates of travel as well as the invoices for the airline tickets indicating they were purchased November 2019 prior to the defendant's arrest. Motty is currently released on a \$100,000 personal recognizance bond co-signed by his cousin Abe New, he fully understands the risks he takes if he fails to return to the United States for the remainder of his case. Motty has no family ties to Italy and only wishes to please his elderly parents by honoring them and the rest of his family while being present at the holiday table (Seder) with the rest of his family. It would be truly devastating to the Drizin family if Motty and his immediate family would not be present to celebrate this holiday together.

I have informed both PreTrial Service Officer Francesca Piperato and AUSA Timothy Capozzi and both have informed me that they will take no position regarding this request.



I am requesting that this Honorable Court grant this request and So Order this letter to allow for the return of Motty's US Passport on or before April 5, 2020 and allow the defendant to travel to Italy from April 6, 2020 until April 19, 2020.

SO ORDERED

Respectfully Submitted,

Saul Bienenfeld

CC:

AUSA Timothy Capuzzi

Pre Trial Services Officer Francesca Piperato

SO ORDERED:

HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

2/11/20